

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO. 04-**
v. : **DATE FILED: _____**
VINCENT SEGERS : **VIOLATIONS:**
: **18 U.S.C. §924(a)(1)(a)(A)(false statement**
: **to a firearms dealer - 8 counts)**

INDICTMENT
COUNTS ONE THROUGH EIGHT

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. The entities listed below were located in the Eastern District of Pennsylvania, possessed a federal firearms license (“FFL”) and were authorized to deal in firearms under federal law:
 - a. Fishtown Lock & Gun, 453 East Girard Avenue, Philadelphia, PA;
 - b. Mike & Kate’s Sport Shoppe, 7492 Oxford Avenue, Philadelphia, PA;
 - c. C&C Sportscenter, 101 Geiger Road, Philadelphia, PA: and
 - d. The Shooter’s Shop, 2001 East Allegheney Avenue, Philadelphia, PA.
2. FFL holders were licensed, among other things, to sell firearms and ammunition. Various rules and regulations promulgated under the authority of Title 18, United States Code, Chapter 44 (Sections 921-929), govern the manner in which an FFL holder may sell firearms and ammunition.
3. The rules and regulations governing FFL holders required that a person

seeking to purchase a handgun fill out a "Firearms Transaction Record," ATF Form 4473. Part of the Form 4473 required that the prospective purchaser certify truthfully, subject to penalties of perjury, that he was the actual buyer of the firearm. The Form 4473 contained the following certification by the purchaser: "I also understand that making any false oral or written statement, or exhibiting any false or misrepresented identification with respect to this transaction, is a crime punishable as a felony."

4. FFL holders were required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder.

5. On or about the dates listed below, in the Eastern District of Pennsylvania, defendant

VINCENT SEGERS
a/k/a/ "Michael Chaney,"

in connection with the acquisition of the firearms listed below from the FFL holders listed below, knowingly made a false statement and representation with respect to information required by the provisions of Title 18, United States Code, Chapter 44 to be kept in the FFL holders' records, in that defendant SEGERS certified on the Firearms Transaction Record, ATF Form 4473, that "Michael Chaney" was his true name, and that he was the actual buyer of the firearms listed below, and when as defendant SEGERS well knew, these statements were false and fictitious:

COUNT	DATE	FFL HOLDER	FIREARM	SERIAL#
1	March 30, 2002	Fishtown Lock & Gun	Glock Model 32 .357 Sig pistol	ESH681-US
2	May 22, 2002	Mike & Kate's Sport Shoppe	Cobray Model PM12 .380 caliber pistol	120015320
3	May 29, 2002	Fishtown Lock & Gun	Cobray PM11 9mm pistol	94-0023118
4	June 3, 2002	C&C Sportcenter	Beretta Model 92B 9mm pistol	BER281561
5	July 16, 2002	The Shooter's Shop	Ruger Model P89 9mm pistol	31503960
6	July 16, 2002	The Shooter's Shop	Ruger Model P97 .45 caliber pistol	66329647
7	November 7, 2002	Fishtown Lock & Gun	Glock Model 19 9mm pistol	EER304US
8	December 31, 2002	Fishtown Lock & Gun	Glock Model 30 .45ACP pistol	EZC323US

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

_____ **A TRUE BILL:**

_____ **FOREPERSON**

PATRICK L. MEEHAN
UNITED STATES ATTORNEY